

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

J.Y.C.C, et al.,)
Plaintiffs,)
v.) No. 4:15-CV-1704-RWS
Doe Run Resources Corporation, et al.,)
Defendants.)

PLAINTIFFS' PROPOSED PROFILE SHEET

ORDER REQUIRING PLAINTIFFS TO FURNISH PERSONAL PROFILE SHEET

The Court hereby orders that each Plaintiff furnish the information described below, *to the extent that it is presently available to Plaintiffs' counsel*, to Defendants. Verification by Plaintiffs is not required for the information that is produced as part of this initial production. At a later date in the course of this litigation and after there is a determination of liability on the part of Defendants, the Court will subsequently order Plaintiffs to supplement their Profile Sheet to include all information described below and at such time, shall produce the information with a verified signature of each Plaintiff or, if applicable, at least one of their respective guardians. The information to be produced includes the following:

1. Each plaintiff shall complete a form ("Plaintiff Profile Sheet") that includes all of the following information:
 - a. The plaintiff's complete name, including first and middle names as well as paternal and maternal surnames.
 - b. The plaintiff's gender.
 - c. The plaintiff's date of birth.

**Exhibit "A" to
Joint Proposed Scheduling Order**

- d. The number from plaintiff's national identity document ("DNI").
- e. The address of each location where the plaintiff resided from the time of birth to the present, and the starting and ending dates (month/year) of the period of time plaintiff resided at each location.
- f. The address of each location where the plaintiff's mother resided while she was pregnant with the plaintiff, and the starting and ending dates (month/year) of the period of time the plaintiff's mother resided at each location.
- g. The complete names, DNIs, and addresses of both parents, or in the case of minor plaintiffs who are in the custody of legal guardians or other family members, the complete names, DNIs and addresses of such legal guardians/family members.
- h. The name and relationship of any other family member who is a plaintiff in this or any other case filed in either this Court or the Circuit Court for the City of St. Louis, Missouri.
- i. The name and address of any schools the plaintiff has attended and the dates of attendance for each school.
- j. The name and address of any employer for whom the plaintiff has worked and the starting and ending dates (month/year) of employment for each employer.
- k. The name and address of any medical provider from whom the plaintiff has sought or received medical care or counsel.
- l. A complete listing of the specific injuries, illnesses or conditions that plaintiff claims were allegedly caused by an exposure to materials or substances from the La Oroya metallurgical complex.
- m. The date the identified injury, illness and/or condition was observed and if applicable, diagnosed, including the name and address of any medical care provider(s) who made each such diagnosis.
- n. Any measured blood-lead testing data that are available for the plaintiff.
- o. For any claim brought by the plaintiff for the injuries claimed in this lawsuit, provide the details of such claim, including the name and location of the court or body before which it was filed, the date the claim was filed, the case number, the result of the proceeding, and the source and amount of any award that was made to plaintiff or any sum of money that was paid to plaintiff in settlement of such claim(s).
- p. A statement detailing any sum of money plaintiff has been paid for the

injuries claimed in this lawsuit other than in connection with a proceeding detailed in subparagraph (s), to include the source and amount of any payment that was made to plaintiff.

q. The names of all attorneys who represent the plaintiff in this case.

2. In addition to providing Defendants with a copy of all completed Plaintiff Profile Sheets, Plaintiffs' counsel shall provide Defendants with certified English translations of any Plaintiff Profile Sheets that contain responses in Spanish. All responses provided on the Plaintiff Profile Sheets must be legible. Further, with respect to documents produced by Defendants during discovery, Defendants shall provide Plaintiffs with certified English translations of any Plaintiff Profile Sheets that contain responses in Spanish.

3. The format of the Plaintiff Profile Sheet shall be developed by the parties consistent with information required to be provided by Plaintiffs under this Order and shall be submitted to the Court for approval within ten (10) days of this Order. If the format of the Plaintiff Profile Sheet cannot be agreed upon by the parties, the parties shall submit a proposed form and note the subject of any disagreement relative to any portion of the form. The Court will address the format of the form and issue an Order approving the final form the Plaintiff Profile Sheet shall take.

4. A case management conference will be scheduled by the Court to review Plaintiffs' compliance with this Order.

IT IS SO ORDERED

Dated this ____ day of January, 2016.

RODNEY W. SIPPEL
UNITED STATES DISTRICT JUDGE